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Counsel for Plaintiff Andrew Okusko

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANDREW OKUSKO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., THE
TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

Defendants.

Case No. 3:17-cv-06829-RS

CLASS ACTION

**NOTICE OF PUBLICATION OF PSLRA
NOTICE PER L.R. 23-1(a)**

TO THE COURT, THE PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 26, 2017, the plaintiff in the first filed case titled, *GGCC, LLC v. Dynamic Ledger Solutions, Inc., et al.*, Case No. 3:17-cv-06779-RS, caused the attached Notice to be published in PRNewswire in conformity with the Private Securities Litigation Reform Act, 15 U.S.C. § 77z-1(a)(3)(A) (the “PSLRA”).

Pursuant to Civil Local Rule 23-1(a), and the December 1, 2017 Case Management Order (Dkt. No. 7), Plaintiff hereby files a copy of the Notice, which is attached hereto as Exhibit A.

Dated: December 18, 2017

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EXHIBIT A



The Restis Law Firm And Lite DePalma Greenberg File Class Action Challenging The Tezos Initial Coin Offering

NEWS PROVIDED BY

The Restis Law Firm, P.C. and Lite DePalma Greenberg LLC →

Nov 26, 2017, 19:42 ET

SAN DIEGO, Nov. 26, 2017 /PRNewswire/ -- The Restis Law Firm, P.C. and Lite DePalma Greenberg LLC ("Restis Law Firm" and Lite DePalma") today announced that a class action has been commenced on behalf of United States persons and entities that contributed bitcoin and/or ethereum to the Tezos Initial Coin Offering ("ICO"). This action was filed in the Northern District of California and is captioned *GGCC, LLC v. Dynamic Ledger Solutions, Inc. et al.*, No. 5:17-cv-06779 (<https://restislaw.com/current-cases-investigations/tezos-initial-coin-offering/>)

If you wish to serve as lead plaintiff, you must move the Court no later than 60 days from November 26, 2017. If you wish to discuss this action or have any questions concerning this notice or your rights or interests, please contact plaintiff's counsel William R. Restis at (619) 270-8383, or support@restislaw.com.

You may also contact Joseph J. DePalma or Bruce D. Greenberg of Lite DePalma at (973) 623-3000, at jdepalma@litedepalma.com, or bgreenberg@litedepalma.com.

If you are a member of this class, you can view a copy of the complaint as filed at <https://restislaw.com/current-cases-investigations/tezos-initial-coin-offering/>. Any member of the putative class may move the Court to serve as lead plaintiff through counsel of their choice, or may choose to do nothing and remain an absent class member.

The complaint charges that Dynamic Ledger Solutions, Inc., Tezos Stiftung (a/k/a the Tezos Foundation), Kathleen Breitman, and Arthur Breitman engaged in an unregistered offering and sale of securities in violation of Sections 5, 12(a)(1) and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77e, 77l(a)(1) and 77o.

Tezos founders claim it is a "decentralized blockchain that governs itself by establishing a true digital commonwealth." Tezos was marketed as potentially solving major limitations of bitcoin and ethereum by "letting participants directly control the rules of the network." Tezos is purportedly "designed to evolve, so that the next generation of ideas doesn't have to start over as a new blockchain."

The complaint alleges that the Tezos ICO was an offer and sale of "securities" to United States investors. As such, the defendants were required to file a Registration Statement with the Securities and Exchange Commission. No Registration Statement was filed, and no exemption from registration was available. Accordingly, Plaintiff seeks to recover bitcoin and ethereum contributed to the Tezos ICO, along with any corresponding appreciation in value of those invested assets, or the equivalent in monetary damages or restitution.



The plaintiff is represented by the Restis Law Firm and Lite DePalma, two firms with extensive experience in prosecuting investor class actions. For over a decade, William Restis has been litigating complex, multi-district, and multi-party class actions. Please visit <https://restislaw.com/> for more information.

Lite DePalma Greenberg is widely recognized as a leading law firm advising and representing U.S. and international investors in securities class actions. Lite DePalma's extensive class counsel experience is listed at <http://www.litedepalma.com/class-action-law-firm>.

SOURCE The Restis Law Firm, P.C. and Lite DePalma Greenberg LLC

